

EXHIBIT 5B

VIKKI

Q So the DJ also would sign the receipt book?

A Yes.

Q Okay. And you would put down how much you paid the DJ?

A Correct.

Q And what would you write down for the --

A DJ I write down.

Q Just DJ?

A Yes.

Q Is there anyone else you had sign your receipt book besides the house mom and the DJ?

A The makeup artist, the house mom tip.

Q Let's start with the makeup artist.

A Yes.

Q Who was the makeup artist?

A It's Kasha or Jennifer.

Q Kasha?

A Yes. Or Jennifer.

Q Is this at Scores East?

A Yes.

Q And what did Kasha or Jennifer do for

1 VIKKI

2 you?

3 A Jennifer and Kasha, they makeup
4 artist. They will do my makeup.

5 Q So when you arrived at the club, you
6 didn't have any makeup on?

7 A No. I would do makeup over there.

8 Q You did it at the club?

9 A Yes.

10 Q You did it yourself or they did it
11 for you?

12 A If I would do it myself, I could do
13 it. I could use makeup or my makeup. You know,
14 they would help me if I didn't have something,
15 and if I was just not feeling to do the makeup
16 they do it for me, and I would pay them.

17 Q But could you decide to do your
18 makeup on your own?

19 A Yes.

20 Q And not pay the makeup artist?

21 A Yes. But you to tip them anyway.

22 Q You had to tip them whether you used
23 them or not?

24 A Yes. If I was doing my own makeup,
25 you have to tip them \$20. And if they going to

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do that for me I would tip them -- it was 40 makeup.

Q Now, who is it -- who -- did anyone ever tell you that you had to tip them --

A Yes.

Q -- whether or not you used them?

A Yes. First day I start, that's what I explained to tip. You know, they saying tip the makeup artist. You have to tip the DJ. You have to tip the house mom. You have to tip each.

Q So you had to pay the house fee to the house mom, and you had to pay the house mom a tip?

A Yes.

Q And how much tip did you give the house mom?

A It was mandatory \$5, but I had always to give it to her \$20, because --

Q It was mandatory \$5?

A \$5. But, you know, she would do a lot of stuff, you know, for us, and I would give her 20.

She was nice. If I need something,

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she would help us. She -- I would give her 20, sometimes 40. Depends, you know.

Q What is it the house mom would do for you?

A You know, she would help. I mean, it's some things. If we had headaches or -- you know, she would get -- I mean, you know, if we needed something. Different ways, you know, but it helps.

Or if I have something to sew, you know, like a dress or a -- she will help me, you know.

Or if I had to buy, you know, something, you know, she will give it to me. If I had to buy a garter, that's what I have to -- you know, from the house mom.

Q She would sell you things?

A Yes.

Q Okay.

A She would bring us, you know, like candies or like desserts, you know, when I had a break. I mean, she was nice.

Q Now, did you ever have a problem with the dress, like it needed some mending or sewing

1 VIKKI

2 Q How big was the locker?

3 A Was not big. Was just a little
4 locker. I would -- like a gym locker.

5 Q How many dresses could you fit in a
6 locker?

7 A Four. Three, four. If I would want
8 stay nice, I only keep one or two, but...

9 Q Now, when you left Scores East, did
10 you take all of the stuff out of your locker?

11 A Yes.

12 Q So you still have your dresses?

13 A Yes.

14 Q So you said it was a mandatory \$5 tip
15 to the house mom?

16 A Right.

17 Q And who informed you of that
18 mandatory tip?

19 A It was rules of the club.

20 Q Who told you that?

21 A The house mom. She would say, "It's
22 \$5 mandatory to makeup artist, and \$5 mandatory
23 to me," to the house mom. That's for house mom.
24 And she would say, "It's \$40 for DJ.
25 If you want to keep off the stage it's a hundred

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dollars." She would say if you --

Q I missed what you said. You said the DJ was \$40?

A \$40. If don't know want to go -- if you --

Q On the stage?

A If you go on stage it's \$40. If you don't want to keep on the stage it's a hundred dollars.

And if you on stage, it doesn't matter. If you go all night on the stage -- I mean, in the end, when you going to go home, if you go to the VIP room for two hours, you still have to pay him \$100.

Doesn't matter if you -- if you went all night long on the stage. You go more than two hours, two hours is enough. He needs -- you have to pay him a hundred dollars.

Q You paid him less if you went on the stage?

A 40. I will pay him 60 because, you know -- I would say I will -- he was -- I mean, that's how he works for tips.

Q Now -- so you would tip the DJ?

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A Yes.

Q Now, did you ever tip the DJ to play certain music that you wanted played?

A Sometimes, yes. Because he was saying, "I don't have that song," you know. He will play that kind of trick, and I would say, "All right. I'm going to tip you at the end. I'll give you \$20."

Q And then he would have the music?

A Yes.

Q Or did you bring your own music?

A No. I never bring my own music. He had, you know.

MR. CAPOBIANCO: I'd like to have this marked as Vikki Exhibit 1.

(Vikki Exhibit 1, application, was marked for identification, as of this date.)

Q Now, Ms. Vikki, when you first went to Scores to apply for the job, did you fill out any paperwork at that time?

A I don't remember. I remember on east side, but I don't remember.

Q Now, this document that we marked as

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Vikki Exhibit 1, is this in your handwriting?

A This one, yes.

Q Yes. And this address here, 928 59th Street, was that one of your addresses?

A Yes. It's one of -- I used to live with my aunt a long time. I just see I remember. Since when I moved to New York, the first address I had.

Q So this was the address you had when you first moved to New York?

A Yes.

Q Okay.

A I'm sorry. I didn't -- I didn't remember this address. It's been awhile.

Q How long did you live at that address?

A About a month.

Q One month. So do you think -- was this the application you filled out when you first started?

A Because I put this address, because my aunt were not moving anywhere. That's why I put the address.

You know, it was like anything I

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A You couldn't work.

Q You put your real name on this document, didn't you?

A Yes, because it's a document. You know, I have to say, you know, but you can't -- you know, couldn't use your real name. Like to work over there you had to have a stage name.

Q Okay. So does it mean that when you spoke with fellow dancers they knew you as Marissa?

A Yes.

Q Or was it a name that you were supposed to use when a customer asked you your name?

A Correct. Or if they would call me on stage, I had to use Marissa. In Scores they have to call me Marissa, not my real name.

Q That's what everyone called you?

A Correct.

Q Okay. Did you have any friends when you worked at Scores?

A Friends like a worker? Yeah. We would say, "Hi. How are you?"

Q But I mean, did you ever tell anyone

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what your real name was?

A (Indicating)

Q Even those friends called you Marissa?

A Marissa.

Q Did you have any friends that you saw outside of work?

A I was not hanging out too much. I was working. You know, I had work and home.

Q Did you ever go out with friends, anybody from work after work?

A No.

Q Never went anywhere in the neighborhood for a bite to eat or anything?

A No.

Q You went straight home?

A Correct.

Q Now, did you work any specific days of the week?

A I worked six days a week.

Q You worked six days a week?

A Correct.

Q When was that?

A Almost two years and a half, almost

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three years.

Q You worked six days a week every week?

A Yes. Except two times I took vacation, probably two weeks.

Q You took vacation two times for two weeks?

A About there.

Q Now, did you decide you wanted to work six days?

A Actually you know, they was decide five days a week, but sometimes like example, if they did not have enough girls for Monday or Wednesday or whatever, you know, if I want to take it, they would say, "Could you please come to work," you know -- or Wednesday was happy hours five to seven.

They open the bar five o'clock, and house mom say, "Can you please, Marissa, come to work? Be here 4:30." "Yeah. Okay."

Q So the house mom called you Marissa?

A Yes.

Q So the house mom would ask you if could work a certain day?

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2 A The manager will ask me.

3 Q The manager, not the house mom?

4 A No. The house mom will ask me, but
5 the manager, Robert, will say "Marissa, please,"
6 or in the beginning when I started you have to
7 work. I mean --

8 Q Then later on it became please?

9 A Yes. "Please can you?" I mean -- I
10 will say no, I can't work. He said no. They
11 would start, you know.

12 They will say why I do -- I mean,
13 "You know, you have to work. You have to help
14 me," you know.

15 Q Did you ever tell him no, you
16 couldn't work, you had something else planned?

17 A Because -- I mean, I told him couple
18 of times, and they said, "We need the girls for
19 this kind of shift."

20 If you not working for four, five
21 years, you know, like you couldn't say like I'm
22 a new girl.

23 I was working there almost, you know,
24 three years and a half, two years. And would
25 say okay, you know. I didn't want to. They

1 VIKKI

2 host?

3 A Correct.

4 Q Okay. So for two hours you could
5 make a thousand dollars minus 120?

6 A Correct.

7 Q So then couldn't you have evenings
8 where you made more than a thousand dollars?

9 A Because after two hours you going to
10 be in the a VIP room, you're going to dance for
11 two hours.

12 I will not have any more energy to
13 stay on high heels to go to the floor. I would
14 be tired, to stay in dressing room until 3 a.m..
15 Time will come I go home.

16 Q So you could just sit in the dressing
17 room and not go out on the floor?

18 A I will go on the floor. You know,
19 I'll go, but sometimes, you know, it's just --
20 customers said, you know, it's -- I don't want
21 it, you know.

22 I don't want, I mean, to dance or I
23 just want to look or just sit, whatever. It's
24 not like you're going to make -- you can make
25 probably a hundred more of that, but not very

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often.

MS. GREENE: Could you read
that last question and answer,
please?

(The requested portion was read
back)

Q Let me ask you this. Could you
decide when you wanted to take a break in the
dressing room?

A I could decide to go for five minutes
or ten minutes, and if I was taking for longer,
the manager will come, everbody outside the
dressing room on the floor.

And, you know, I had to go on the
floor, so I had to ask. You know, I have
customer, but if he don't want to get a dance, I
couldn't do anything.

I just sitting in the bar, and
wherever new customer will come, you know, I'll
go ask again, or after ten minutes I will say,
"You ready now?" Or "Would you like?"

But I couldn't stay for entire
dressing room. Nobody will let me. Like I will
come -- you have to go on the floor. It's

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2 not -- you know, you can't stay there.

3 Q Now, at the end of the evening you
4 would have some cash and you would have some
5 diamond dollars?

6 A Yes.

7 Q Did you have to -- did anyone record
8 how much cash you made?

9 A What you mean? I don't understand
10 the question.

11 Q Well, did anyone ever ask you how
12 much cash you made that evening and was -- did
13 someone write it down on a piece of paper?

14 MS. GREENE: Objection.

15 Q Do you understand the question?

16 A I don't understand what you mean by
17 that.

18 Q Okay. So the end of the evening
19 comes. You have some cash and you have some
20 diamond dollars, right?

21 A (Indicating)

22 Q Do you have any other thing of value
23 besides cash and diamond dollars?

24 A First of all, I mean, I will make
25 probably \$40 in cash, and 95 percent was diamond

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dollars.

Q 95 percent was diamond dollars?

A Yes. If I have cash at the end of the night, it be will be probably cash I took with me in case for -- you know, for my money.

I mean, I took -- I always have -- was taking cash with me. If anything happened, I have to have cash with me, because whatever I was cashing in the funny money, I will not get cash.

I get checks and, you know, how I knew I was getting cash the shift I was working, I had to have cash with me.

Q Okay. So you say you may have brought your own cash?

A Yes.

Q But aside from the cash you brought yourself, you could get tipped cash by customers?

A It would be five percent.

Q A small amount, but you could still have cash?

A Yes.

Q My question is, from the cash that

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A I had to go to the office, you know.

Q To the office?

A Yes. And there was a time between nine to ten or seven to nine. I don't remember. You know, between seven or eight to ten, whatever, you know, wherever they would make a DJ -- the DJ would make a call, like they doing diamond dollars.

But that was between, I could say, 7:30 to 10:00 or depends. You know, like not more than 10:00, 10:30 to be, but always the DJ will say the funny money now. They're doing funny money.

Q And the DJ would make that announcement. You could go down to the office?

A Yes.

Q Where was the office?

A It was -- soon as you walked to the club, and it's on the right. Right before you go to the restrooms.

Q And so you go to the -- you would go to the office and you would do what? Give --

A I would wait on the line. I would say one by one. And I would give the diamond

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dollars, and he will give a check, and the check will be cashed after two weeks.

Q Would you get a check right there?

A Yes.

Q Would you get a check right then and there?

A Yes.

Q And so you've given the diamond dollars and then you'd get a check.

Did you have to sign a piece of paper?

A Correct. Yes. I have to. I had to.

Q So if you turned in a thousand dollars in diamond dollars, how much would the check be for?

A It's -- they keep -- I mean, it was ten percent. They keep ten percent. They put in -- I mean, after awhile, they took 20 percent.

You know, they had -- if I -- you know, they'll keep 20 percent. They change it back to ten percent, but between ten and 20 percent they'll keep for the funny money.

Q So it went to 20 percent for awhile?

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A Yes.

Q This is on the east side?

A Both clubs. It was -- when I was working on the east side some -- you know, then maybe it was about three or four months they were charging 20 percent, 20 percent, and then went back to 10 percent.

Q So you go with the diamond dollars. You give in, let's say, a thousand dollars in diamond dollars.

You get back a check right away that's made payable to you?

A Yes.

Q It has your name on it?

A Yes.

Q It doesn't say Marissa?

A No.

Q It has your name on it?

A Correct.

Q Does it have an address on it?

A No. I don't remember. No. The date.

Q Was there any taxes taken out of the check?

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A I had to pay and -- but it was ten percent. I told you what they had to.

Q No. I understand the ten percent. I'm asking you if there were any taxes deducted from the check.

If you put in a thousand dollars, how much would the check be for?

A They could keep 10 percent or 20 percent, whatever, you know, and I'll get the rest. End of year I would pay the taxes, 1099, but not, you know...

Q They didn't deduct the taxes while you were working there?

A No.

Q Okay. So every day that you worked you would cash in the diamond dollars and get a check?

A If I had it, you know. I mean, whatever I had, yes. Or some -- you know, sometimes it was holiday. The banks was not open. We couldn't cash the money, funny money. We were working, but couldn't cash it.

Q No. I'm not talking about the diamond dollars.

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after 4 a.m. in the morning.

Q They always did it anyway?

A Yes.

Q But you understood that the rule was that you couldn't serve alcohol after 4 o'clock in the morning?

A Yes.

Q Now, did you understand that -- that -- look at Number 5 here.

If you had -- if any customer made any improper physical or verbal advance to you, that you were supposed to report that to Scores management?

A I don't understand this question. What you mean? Can you clarify it, please?

Q Let me read Number 5.

A I can read Number 5, but it's too complicated. I don't understand clearly the question.

Q You can read Number 5, but you don't understand my question?

A I mean, it's too complicated. You know, like I -- I don't...

Q Well, let me just read for the record

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2 Number 5.

3 "While working at Scores, I am to
4 immediately report to Scores management any
5 improper verbal or physical advance or
6 suggestion of any kind made to me by either a
7 customer or staff member."

8 When you were working at Scores, did
9 anyone make an improper physical advance to you?

10 A Physical advance. What --

11 Q Did they touch you inappropriately?

12 A No.

13 Q -- customer? Never had that occur?

14 A No.

15 Q By a customer or a staff member?

16 A No. I will not let them, you know.

17 With a staff I will keep, you know, the
18 distance.

19 Just say hi, bye, and the customer
20 no. I was -- you know, the rules. He will not
21 touch me.

22 Q Did you understand that there were
23 rules that Scores imposed on the customers?

24 A Yes.

25 Q Okay. Did you understand that if

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some customer violated those rules, you could report them to the manager or to some member of management?

A Yes. I will do.

Q Did you ever report a customer to a member of management?

A Yes.

Q Why?

A I mean, sometimes, you know, they will be like, "Oh, no. I'm not looking for a dance, "or, you know -- I mean, probably was drunk, you know.

Q What -- what was it that you were reporting to management?

A You know, he was like probably like more he wanted touch more, like more aggressive, I should say.

And I will leave the room. I will not report. I will report and leave the room. That's it.

Q Leave the private room?

A Yes. I not going back. I don't care who was. Maybe, you know, because some of the customers they be regulars over there, and host

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2 accept, you know, like they have their own girl,
3 you know, if the customer is coming there for
4 ten years, but I will not accept that. No. I
5 will just leave the room, not get my money and
6 not go back, period.

7 Q Okay.

8 A And I -- you know, couple of times
9 that's what I did. I left the room, and that is
10 it.

11 Q Let's look at Number A -- well, first
12 of all, above A it says, "I confirm that I am an
13 independent contractor and not an employee of
14 Scores."

15 Is that something you understood when
16 you worked for Scores, that you were an
17 independent contractor?

18 A No.

19 Q You didn't understand that?

20 A No.

21 Q Did you think you were an employee?

22 A Yes.

23 Q And did you say that to them?

24 A Yes.

25 Q And who did you say that to?

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A I said it to everybody.

Q Everybody?

A I said to house mom. I said to the manager. If I'm an employee -- if I'm independent contractor, why -- you know, like what I will say, for example, like even when you go to the VIP room, you can't -- why you have to -- I have to go and sell the bottles, champagne or whatever.

If I'm an independent contractor, I pay the house fee, and I will do whatever, you know, because I don't want to drink. I don't want to get drunk.

Why I have to down the champagne in front of the customers? You know, if you don't want to buy, you don't want to buy, you know. I mean, it's -- you know, if I was independent or if I was not, you know.

Q Did you get a fee for selling a bottle in the VIP room?

A No. And if I would not sell a bottle, they will come after me. "This is not nice, not working properly. You have to -- you know, that's how we make our money, you know.

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That's why you work here."

I mean, I don't feel drinking, and sometimes I did pour, you know, the champagne or the bottle of vodka, whatever drink he'll get.

You know, I will pour in the bucket, whatever, but he would see. Sometimes he would say, "Oh, cheers. Let's drink this shot."

You know, I don't want to drink. I don't want to get drunk, because that's not why I'm going over there.

You drink a glass of wine, but you can't drink two bottles of wine or you can't drink three bottles of champagne. You cannot, or is a drink I don't like it.

Or if the customer says, "No, I don't want to pay for champagne, you stick out with a pen and paper. No. He don't want. We push. "No, you have to pay."

You have to say -- go outside. The host will call out, say no, you have to sell it. You have to sell it.

Q Let's look at Number A. It says, "I have the right to perform services for others during the term of this agreement, and will not

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be required to devote my full time to providing these services to Scores."

Did you understand that you were permitted to work for other clubs at the same time you were working for Scores?

A What you mean by that? I was permitted to work for other --

Q That you were permitted to also dance or be an entertainer at other clubs besides Scores while you were working for Scores.

A No. I couldn't work for the other clubs.

Q You didn't -- you couldn't work?

A No.

Q Why not?

A Because will not let me. If they going to find out, they will fire me.

Q Who told you that?

A Who told me that? Was a part of the -- that was explained the first day I sat with one of the -- you know, the house mom told me, "You can't work for no other club. If they find out you're going to get fired."

Q The next one says, "I will not

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2 receive any employee benefits, such as employee
3 pension plan, employee health plan, vacation
4 pay, sick pay or any other fringe benefit plan
5 that may be offered by Scores to its actual
6 employees." Was that true?

7 A I don't understand that question.

8 Q Well, did you receive any employee
9 benefits while you worked for Scores?

10 A I don't remember.

11 Q Well, for example, when you went on
12 vacation, did you get vacation pay?

13 A No.

14 Q Number C says, "I will pay all my own
15 business expenses that I incur while performed
16 under this independent entertainer agreement."

17 Did you pay your business expenses
18 when you worked for Scores?

19 MS. GREENE: Objection.

20 A I don't understand that question.
21 Clarify the question, please?

22 Q Well, if you purchased dresses, did
23 you -- did you pay for the cost of the dress?

24 A Of course, yes.

25 Q When you took the bus, who paid the

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giving written notice of termination with or without cause."

Did you understand that you could quit at any time or they could let you go at any time, with or without notice?

A No. It's not true.

Q It's not true. Why not?

A Because you can't quit. I'm just going to quit because if -- you know, what I would say.

If you just not -- if you're going to quit, at least -- like example this. I work tonight. I don't want to work anymore. I have a thousand funny money with me, right?

And if I not going tomorrow, after tomorrow they going to call me, you know. Because they never going to cash the money for me.

And that money is -- you know, that's why I have to let them know, you know. I can't work. Like two weeks in advance.

Q Now, when you resigned, did you have to put something in writing?

A What you mean by that?

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2 Q You said you were resigning. You
3 quit because you were -- you were pregnant. You
4 told them you quit.

5 A Yes.

6 Q Did you have to sign -- put anything
7 in writing, saying "I resign" or --

8 A I give it -- yes. I put the letter.
9 Like I give it to the -- in the office. I don't
10 remember exactly.

11 Q You did write a letter?

12 A Yes.

13 Q Saying you were leaving?

14 A Yes.

15 Q Did you keep a copy of that letter?

16 A I nevet got copy. I don't have a
17 copy.

18 Q Now, did anybody at Scores West or
19 Scores East ever provide you with any training?

20 A What you mean, training?

21 Q Well, did they show you how to do
22 your job?

23 A I took -- to teach me, you mean?

24 Q Yes.

25 A No, but, you know, like -- I'm sorry.

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2 In beginning when I start working over there, I
3 was uncomfortable to take my dress off, and they
4 would scream at me, "You have to take the dress
5 off, you know, or we'll fire you," you know.

6 Q But did they know how to do it?

7 A Yeah. I mean, they will show me.
8 Nobody danced for me. I can see, but they were
9 saying to me, "Look at this girl what she do.
10 That is what you should do."

11 Q So they pointed to somebody else as
12 an example?

13 A "See what she does? That's what you
14 should do. Take the dress off, you know. This
15 is a topless, you know."

16 Q Did you ever get a handbook from
17 Scores East or Scores West?

18 A What you mean by handbook?

19 Q A booklet.

20 A Regarding what?

21 Q Regarding house rules or suggestions
22 for how you can make more money or anything like
23 that.

24 A No. They would explain to us by
25 speaking, but no.

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Q Now, did you ever wear your dress to
or from Scores?

The dress you had to wear while you
were working there, did you ever come to work
wearing that dress?

A No.

Q Did you ever have to carry a dress
with you?

A What you mean, carry?

Q Bring it from home.

A Yes, because I had to wash it, and if
I -- I wear that dress, you know, I have to wash
it and iron it or dry clean, and I have to bring
it.

Q So you just carried it on the subway?

A Oh, no. I put it in a bag.

Q No. You put it in a bag, but then
you carried the bag on the subway?

A Yes. You couldn't carry even, you
know.

Q So you never left Scores East or West
wearing the dress?

A Absolutely not.

Q You changed in the changing room?

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2 A Yes.

3 Q Dressing room?

4 A It was not to wear outside.

5 Q Excuse me?

6 A Those dresses completely -- you
7 couldn't wear the dress even -- no.

8 Q Well, did anyone tell you that you
9 weren't allowed to wear that dress outside?

10 A Nobody. I mean, I don't remember,
11 but I would not wear it.

12 Q You mean for your own personal
13 reasons you wouldn't wear that dress anywhere
14 else?

15 A Yes. It -- I don't remember if they
16 tell me or -- told me or not, but I would not
17 wear it.

18 Not me, but none of the girls would
19 not wear it. It was just not to wear like
20 dinner dress or, you know.

21 MR. CAPOBIANCO: I'd like to
22 have this marked as Vikki 3.

23 (Vikki Exhibit 3, application
24 for entertainers, was marked for
25 identification, as of this date.)

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Q Now, is this document in your handwriting?

A Yes.

Q I see the second page doesn't appear to be filled out.

Do you remember starting to fill out an application and never finishing it?

A I don't remember.

Q This entertainer number at the top, G 0001, was that ever your ID number?

A I don't remember.

Q Well, the other application we looked at said G 00117.

Do you remember either of these numbers?

A I don't remember this one. I don't remember. I don't know.

Q Well, do you remember 117?

A 117 I do remember, but I don't remember that. That one probably was something GO, but I don't remember, you know. It's been awhile.

Q Okay.

MR. CAPOBIANCO: I'd like to

1 VIKKI

2 may only charge \$20 for a dance?

3 A Yes.

4 Q Okay. And that if you charged more
5 than that you'll get fired?

6 A House mom will tell you that, too.
7 Even Robert or house mom, you know. First day
8 it starts, she explains no negotiation.
9 Don't -- you know, it's \$20. You know,
10 everything, all the -- what you should do.

11 Q Well, you said it was \$20 for a
12 dance, but it was \$500 for a room?

13 A Yes.

14 Q And the house mom told you that that
15 was not negotiable?

16 A No -- yes. I mean is not --

17 Q I'm sorry.

18 A Okay.

19 Q Which house mom is it that said this
20 to you?

21 A It's both Lisa or Gina. Both working
22 for club, and both had the same rooms.

23 Q They both told you that you couldn't
24 negotiate a different amount for a dance?

25 A No.

VIKKI

Q Or for the room?

A No.

Q I mean, they told you that?

A Yes.

Q When was this?

A When they asked -- the day they hired me. And, you know, she explained to me everything.

Q Now, it's your understanding that you received this \$20 as a fee for the dance?

A I received those \$20 per dance.

Q Okay. And now, do you ever receive cash for a dance?

A Sometimes. But not that very often. Maybe five percent.

Q Do customers ever give you -- did they ever give you more than \$20 for a dance?

A No.

Q Never?

A No.

Q How long is the dance?

A One song.

Q One song.

A Or maybe a little bit more because --

1 VIKKI

2 one song.

3 Q I mean, if a customer wanted you to
4 dance for another song, could you do that?

5 A Yes.

6 Q Did that ever happen?

7 A Sometimes. But not very often.

8 Q Now, did you understand that when you
9 received the \$20 as diamond dollars, that that
10 was worth \$18 to you?

11 A Yes.

12 Q That you understood?

13 A Because it's -- yes. It's -- since I
14 start I was going ten percent, 20 percent that
15 would get from the funny money, and I do
16 understand that.

17 Q So at the time you actually received
18 the diamond dollars, the \$20 in diamond dollars,
19 you knew that you would only be getting \$18 in
20 U.S. currency for that?

21 A Yes. I believe, yes.

22 Q Now, the money you received for doing
23 dances or going into the VIP room, that was
24 money you received from the customers of Scores,
25 right?

1 VIKKI

2 A As I'm saying, Robert. He was the
3 GM, because this was not his fault, but that's
4 how the club rules, you know, that people.

5 Q Now, how many times did Robert ever
6 come over to you and say they needed you right
7 now to dance on the stage?

8 A Many times.

9 Q Many times?

10 A Yes.

11 Q Well, how many -- how many times a
12 year did that happen?

13 A I don't know exactly, but happen a
14 lot of times.

15 Q How many?

16 A I don't remember like how many.

17 Q Can you give me an estimate of how
18 many times it happened during the time you
19 worked there?

20 Did it happen once or ten times or a
21 hundred times?

22 A 50 times probably.

23 Q 50 times you were told you had to
24 dance?

25 A Yes.

1 VIKKI

2 Q On the stage?

3 A Yeah.

4 Q Nobody wanted to dance on the stage?

5 MS. GREENE: Objection.

6 Q Do you understand that question?

7 A No. I don't understand the question.

8 Q Did -- was it -- was dancing on stage
9 something that a lot of the dancers didn't want
10 to do?

11 A Because a lot of the dancer probably
12 it was busy, and I really don't know, and we had
13 to go even if -- I don't know how they work over
14 there. Honestly I don't know. I don't know. I
15 never understood. I don't know.

16 Q You never understood what?

17 A How the stage works. Probably -- I
18 don't know. It's very difficult to explain, but
19 if I was not going on the stage it would be a
20 big problem.

21 Q Did you ever refuse to go on the
22 stage?

23 A Yes. I did a couple of times. I
24 never -- I went. You know, I start -- got -- I
25 said what I said, and they said, "I'm sorry.

VIKKI

Stage."

Q You mean you tried to refuse, and they said go on the stage anyway?

A Yes.

Q Who did that? Who did you try to refuse to?

A Try to refuse to the DJ. I said, "I'm not going. Don't call me." I said, "I'm paying you enough."

The house mom came and managers came, and I went to the dressing room. I said, "I'm paying him. I don't know, you know."

They said like, "But I don't have any girls to put on stage. You have to go." And I'm like explaining like why it have to be me.

Q You said that to whom?

A To the house mom, to the manager, to the DJ, two or three of them.

Q All three of them you said "Why does it have to be me?"

A Yes.

Q What did they say?

A "I'm sorry. It's all you."

Q It's all you?

VIKKI

A Yes. "All you to come to the stage. Just you. Stage is yours now." You know, had to.

Q Now, do you know -- did you know any of the bartenders when you worked there?

A I know by face, but not by names.

Q Did you ever discuss how the diamond dollars worked for the bartenders?

A No.

Q No. So do you know if they ever even received diamond dollars, the bartenders?

A No.

Q What about the cocktail waitresses? Do you know if they received diamond dollars?

A I don't know.

Q And do you know, if they did receive diamond dollars, how it worked for them?

A I don't know.

Q Did you ever have to buy any clothes for a theme night?

A Yes.

Q What was the theme night?

A It was Christmas, Halloween, Super Bowl, Valentine's Day.

1 VIKKI

2 Q You worked all four of those days?

3 A We start the week or two weeks early
4 for those. Days will come.

5 Q Tell me the days again? Christmas,
6 Halloween --

7 A Super Bowl.

8 Q Super Bowl.

9 A And Valentine's Day. We start two
10 weeks or ten days or week and a half until the
11 day will come.

12 Q What did you have to buy for
13 Christmas?

14 A Like a Santa Claus like outfit. Like
15 lingerie. Lingerie. Like --

16 Q Lingerie?

17 A Lingerie.

18 Q Santa Claus lingerie?

19 A Yes. I can't -- I don't know how to
20 actually explain to you, but lingerie.

21 Q You bought Santa Claus lingerie from
22 where?

23 A Scores.

24 Q How much did that cost?

25 A It was 100, a 120, 80, depending.

VIKKI

Depends which lingerie I like. I don't remember.

Q Did you buy it every Christmas?

A Yes. Of course. Yes.

Q You bought one outfit or more than one outfit?

A I bought about three.

Q Three Christmas outfits?

A Yes, because you can't wear every day same outfit. You have to change.

Q What did you wear for Halloween?

A I don't remember. But I think -- I was -- I don't remember. I really don't remember. I bought couple of costumes, three or four costumes, but I can't remember what it was.

Q What about for Valentine's Day?

A Would be lingerie.

Q Any specific kind of lingerie?

A I bought it in Scores. I mean, specifically I bought it over there. Whatever, you know, they sell I bought it. I don't know how to explain the specific.

Q Well, it -- were -- any of the lingerie you had for Christmas, could you use

1 VIKKI

2 those for Valentine's Day?

3 A No.

4 Q No?

5 A Had to be different type. Different.

6 Q How many Valentine's Day outfits did
7 you buy?

8 A You would buy three, because, you
9 know, we would start ten days or two weeks or a
10 week. You can't wear -- you have to change it.

11 Q And what did you have to wear for the
12 Super Bowl?

13 A Like a -- what do you call them?
14 Like whatever T -- like T-shirt. Like, you
15 know, I should say, like a type of shirt but
16 not -- that goes up.

17 Have to be -- have to be open and,
18 you know, enough to go -- I mean, you -- like
19 your Jersey team or Philadelphia. Depends.
20 Would be a Super Bowl shirt.

21 Q You mean a football shirt?

22 A Yes.

23 Q And did you have to buy one of those?

24 A I don't remember that. I don't know.
25 I don't remember.

1 VIKKI

2 Q Well, were you able to use these
3 special outfits from one year and the next year?

4 A Possibly, but no. You know, no. I
5 always -- every year I bought -- I worked over
6 there I got new outfits every time when those
7 days will come up.

8 Q Now, did you ever buy any dresses at
9 Scores that cost \$40?

10 A \$40. I never remember that, no. No.

11 Q What was the least you paid for a
12 dress at Scores?

13 A The minimum I believe -- I'm not
14 sure. Hundred dollars, because I remember once
15 was a hundred dollars, because it was like on
16 sale.

17 Q So it's -- what was the most you paid
18 for a dress?

19 A 180.

20 Q 180. Now, did you ever not show up
21 for one of your scheduled shifts?

22 A No. I came sometimes late couple of
23 times because the trains, you know. And I got
24 in trouble.

25 They were saying to me, "Next time if

VIKKI

you do you're going to -- you know, we'll suspend you," and -- but --

Q Before we talk about lateness, let me talk about -- did you ever have a shift you were supposed to go for and you never went to it?

A No. I -- always I was on. I never -- I always show up.

Q You never called in sick?

A No. What I remember, it's no.

Q You never called in sick or had some type of personal emergency that --

A I will go sick to work, and when they see me I was sick. You know, I still try to work.

If you can't work you go home, and after that I had to deal for my house fee. But "See, I told you I can't work." Those kind of...

Q Well, did you ever have a personal emergency or something that caused you not to be able to go into work?

A I don't remember.

Q Now, when you said you got in trouble for being late, who spoke to you about your